

MEYERS LAW GROUP, P.C.  
MERLE C. MEYERS, ESQ., CA State Bar #66849  
44 Montgomery Street, Suite 1010  
San Francisco, CA 94104  
Telephone: (415) 362-7500  
Facsimile: (415) 362-7515  
Email: [mmeyers@mlg-pc.com](mailto:mmeyers@mlg-pc.com)

Attorneys for Alps Automotive, Inc., Creditor

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

DELPHI CORPORATION, et al.,  
  
Debtors.

Chapter 11

Case No. 05-44481 (RDD)  
Jointly Administered

**NOTICE OF MOTION OF ALPS AUTOMOTIVE, INC. TO PERMIT LATE-FILED  
OBJECTION OF ALPS AUTOMOTIVE, INC. TO DEBTORS' (A) NOTICE OF  
ASSUMPTION AND/OR ASSIGNMENT OF EXECUTORY CONTRACT OR  
UNEXPIRED LEASE TO BUYERS IN CONNECTION WITH SALE OF STEERING  
AND HALFSHAFT BUSINESS; AND (B) NOTICE OF CURE AMOUNT  
WITH RESPECT TO EXECUTORY CONTRACT OR UNEXPIRED LEASE  
TO BE ASSUMED AND ASSIGNED IN CONNECTION  
WITH SALE OF STEERING AND HALFSHAFT BUSINESS**

**PLEASE TAKE NOTICE** that pursuant to this notice of motion and the accompanying motion and supporting declaration, Alps Automotive, Inc. ("Alps"), by its attorneys, Merle C. Meyers, Esq. of Meyers Law Group, P.C., will move this Court before the Honorable Robert D. Drain, United States Bankruptcy Judge, at Courtroom 610 of the Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, at the Omnibus Hearing to be held on March 19, 2008, at 10:00 a.m., or as soon thereafter as counsel may be heard, for an order pursuant to Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure, extending the time for Alps to file its objection to the notices of the above-captioned debtors (the "Debtors") of assumption and assignment of executory contracts and of cure amount with respect to executory

contracts (the “Notices”) as if Alps had timely filed the objection, as Alps’ untimeliness is by reason of “excusable neglect,” together, all as more fully set forth in said motion.

**PLEASE TAKE FURTHER NOTICE** that responses, if any, must (i) be made in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules; (iii) set forth the basis for the response and state with specificity the reason or reasons why the requested relief should not be granted; and (iv) be (a) electronically filed with the Bankruptcy Court at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s case filing system, and by all other parties in interest, by submitting to the Clerk of the Bankruptcy Court at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, the response on a 3.5 inch disk, preferably in Portable Document Format (pdf), Microsoft Word, WordPerfect, or any other Windows-based word processing format, and served in accordance with General Order M-242 with a paper copy delivered directly to the Chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge for the Southern District of New York, together with proof of service thereof, and (b) served upon counsel for Alps, Meyers Law Group, P.C., 44 Montgomery, Suite 1010, San Francisco, CA 94104, Attn: Merle C. Meyers, so as to be received on or before March 12, 2008.

DATED: February 26, 2008

MEYERS LAW GROUP, P.C.

By: /s/ Merle C. Meyers  
Merle C. Meyers, Esq. CA State Bar #66849  
44 Montgomery Street, Suite 1010  
San Francisco, CA 94104  
Telephone: (415) 362-7500  
Facsimile: (415) 362-7515  
Email: [mmeyers@mlg-pc.com](mailto:mmeyers@mlg-pc.com)  
Attorneys for Alps Automotive, Inc., Creditor